

REMARKS

Claims 1-20, 22-26 and 30 are currently pending in the subject application and are presently under consideration.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

I. Rejection of Claims 1-5, 13, 16-18 and 30 Under 35 U.S.C. §103(a)

Claims 1-5, 13, 16-18 and 30 stand rejected under 35 U.S.C. §103(a) as being obvious over Wu *et al.* (US 5,774,551) in view of Lafer *et al.* (US 6,192,382). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.* and Lafer *et al.*, alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicants' disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicants' claimed invention relates to a system and method that simplifies writing a program that will respond to challenges from various authentication systems. The system provides for treating various authentication systems in a generic manner so that it does not require recompiling and recoding of an application to interact with different authentication systems. In particular, independent claims 1, 16, and 30 recite similar limitations namely ***a learning component that determines anticipated authentication challenges to resource requests from applications based on responses generated during previous resource requests by applications.*** The cited references are silent regarding such novel aspects of the subject claims.

Wu *et al.* teaches an application programming interface that mediates between the system entry services and the account management services on a computer. At page 5 of the Final Office Action, the Examiner concedes that Wu *et al.* fails to teach determining anticipated requests from applications based upon responses generated during previous resource requests by applications. The Examiner attempts to compensate for the aforementioned deficiencies of Wu *et al.* with Lafer *et al.* In accordance with the claimed invention, the system anticipates authentication challenges by run-time learning and prepares a response *in advance* to the actual challenge being received. For example, when system A is trying to connect to system B, the system can predict that system B will issue an authentication challenge and prepare a response in advance of system A receiving the actual challenge. This anticipatory analysis reduces the time required to complete the authentication. Lafer *et al.* teaches a system for web page construction and distribution in which personalization of individual pages is done, by locating a tag cache in a server and embedding associated tags into stored pages. At the cited portions, the cited reference discloses a user request for information in the form of an HTML page. The system checks to see if the page has been cached, in case where it has been cached the cached page is sent to the user. Thus, the system facilitates a user request from a cache that stores previously requested information. However, Lafer *et al.* is silent regarding authentication challenges, let alone ***anticipating authentication challenges to resource requests from applications based on responses generated during previous resource requests by applications*** as in applicants' claimed invention.

In view of at least the foregoing, Wu *et al.* and Lafer *et al.*, alone or in combination, fail to teach or suggest all limitations of applicants' invention as recited in independent claims 1, 16 and 30 (and the claims that depend therefrom), and thus fail to make obvious or suggest the claimed invention. This rejection should be withdrawn.

II. Rejection of Claims 6-7, 22-23 and 26 Under 35 U.S.C. §103(a)

Claims 6-7, 22-23 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Wu *et al.* in view of Lafer *et al.* and further in view of Travis *et al.* (US 6,269,367). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.* Lafer *et al.* and Travis *et al.* alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

Independent claims 1, 22 and 26 recite similar limitations namely *a learning component that determines anticipated authentication challenges to resource requests from applications based on responses generated during previous resource requests by applications, generating a pre-authentication challenge test message based upon anticipating an authentication challenge to a resource request from an application based on responses generated during previous resource requests by applications*. As discussed *supra*, Wu *et al.* and Lafer *et al.* do not teach all aspects of the subject claims. Travis *et al.* does not compensate for the aforementioned deficiencies of the primary references. Travis *et al.* teaches a system for identifying code fragments in a program and correcting the code fragments. Nowhere does Travis *et al.* teach *generating a pre-authentication challenge test message based upon anticipating an authentication challenge to a resource request from an application based on responses generated during previous resource requests by applications* as taught by the subject claims.

In view of the above, Wu *et al.*, Lafer *et al.* and Travis *et al.* alone or in combination, fail to teach or suggest all limitations of applicants' invention as recited in independent claims 1, 22, and 26 (and the claims that depend therefrom). Therefore, it is requested that this rejection be withdrawn

III. Rejection of Claims 8-12, 14-15, 19-20 and 24-25 Under 35 U.S.C. §103(a)

Claims 8-12, 14-15, 19-20 and 24-25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Wu *et al.* in view of Lafer *et al.* and Travis *et al.* and in further view of Object Oriented Programming as illustrated by Burroughs *et al.* (US 5,878,411), Kumar *et al.* (US 6,343,287), Microsoft Press (Microsoft Press, "Computer Dictionary, 3rd edition, ISBN: 157231446X, 1997) and New Rider (New Rider, "Windows 98 Professional Reference", <http://cma.zdnet.com/book/win98prfref/ch15/ch15.htm>). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.*, Lafer *et al.*, Travis *et al.*, Burroughs *et al.*, Kumar *et al.*, Microsoft Press and New Rider alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

Claims 8-12, 14-15, 19-20, and 24-25 depend from independent claims 1, 16 and 22. As noted *supra*, Wu *et al.*, Lafer *et al.* and Travis *et al.* does not teach or suggest each and every element of the subject invention as recited in these independent claims and Burroughs *et al.*,

Kumar *et al.*, Microsoft Press and New Rider fails to make up for the deficiencies of these references with regard to the noted independent claims. Accordingly, it is respectfully requested that this rejection be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP202US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN, TUROCY & CALVIN, LLP

/Himanshu S. Amin/

Himanshu S. Amin

Reg. No. 40,894

AMIN, TUROCY & CALVIN, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731